

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ZapFraud, Inc.

Plaintiff,

v.

Barracuda Networks, Inc. et al.

Defendants.

Civil Action No. 19-cv-1687-MN

**JURY TRIAL DEMANDED**

**STIPULATION REGARDING FIRST AMENDED COMPLAINT**

**AND PROPOSED ORDER**

Subject to the Court's approval, plaintiff ZapFraud, Inc. ("ZapFraud") and defendants Barracuda Networks, Inc. and Barracuda Holdings, LLC (collectively "Barracuda") hereby stipulate that:

1. Pursuant to Federal Rule of Civil Procedure 15(a) and in the interest of judicial efficiency, ZapFraud may bring its action by amending its original complaint and filing the First Amended Complaint attached hereto as Exhibit 1. The redline of the First Amended Complaint is attached as Exhibit 2.

2. The First Amended Complaint shall be deemed filed and served upon the filing of this stipulation;

3. Barracuda shall have until November 14, 2019 to answer or otherwise respond to the First Amended Complaint; and

4. By entering into this Stipulation, Barracuda is not waiving any right to challenge the sufficiency of ZapFraud's pleading.

Dated: October 18, 2019

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 North Market St., 12<sup>th</sup> Floor  
Wilmington, DE 19801  
Telephone: 302-777-0300  
Facsimile: 302-777-0301  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

*Attorneys for Plaintiff ZapFraud, Inc.*

Respectfully submitted,

Rimon, P.C.

/s/ Karineh Khachatourian

Karineh Khachatourian  
2479 E Bayshore Road, Suite 210  
Palo Alto, CA 94303  
Telephone: (650) 461-4433  
karinehk@rimonlaw.com

*Attorneys for Defendants*

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
United States District Judge